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Attorneys for Union Telephone Company

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

IN THE MATTER OF THE PETITION OF)))
QWEST CORPORATION FOR ARBITRATION OF	
AN INTERCONNECTION AGREEMENT WITH	
UNION TELEPHONE COMPANY d/b/a UNION) Docket No. 04-049-145
CELLULAR UNDER SECTION 252 OF THE)
FEDERAL TELECOMMUNICATIONS ACT)

AFFIDAVIT OF HENRY D. JACOBSEN

- I, Henry D. Jacobsen, being first duly sworn, do depose and state as follows:
- 1. I am the Director of Engineering and Construction, for Union Telephone
 Company of Mountain View, Wyoming. I am familiar with the above captioned matter and
 have previously provided testimony which was filed with the Utah Public Service
 Commission. Most recently, I have been provided a copy of Qwest's Opposition to Union's
 Motion to Accept Post-Rebuttal Testimony of Henry D. Jacobsen or, in the alternative,
 Motion to Vacate Schedule and Motion for Sanctions. I would dispute the factual
 allegations and representations contained in the Motion and aver as I have maintained
 previously, that Union has only recently installed software to track traffic on its wireless
 system and that the allegations contained in the Motion are wholly inappropriate.
 - 2. On or about March 8, 2007, I participated in a conference call with counsel

for Union in regard to certain testimony that had been filed by one Peter Copeland. In the conference call, I was advised of the substance of Mr. Copeland's testimony in regard to the manner in which Union monitored its traffic sensitive system. I indicated to those in the conference call, that Mr. Copeland's assertions were not consistent with the software which had just recently been installed. I noted that we had installed new software which addressed certain of the items referenced by Mr. Copeland and offered to provide a sample report that was just recently being developed. I provided the same to those on the conference call and later a copy to those participating in another conference call with representatives from the Department of Public Utilities. Following this meeting, it was decided that it would be appropriate to provide testimony in response to Mr. Copeland's position as his testimony was inaccurate. Accordingly, I assisted in the preparation of testimony that was ultimately filed with the Commission on or about March 15, 2007.

- 3. As to Qwest's allegations in its Opposition, I would state specifically that Union has not contended in the past that it had no underlying traffic collection methods, only that Union did not have the traffic reporting systems specifically required by Qwest's data requests. Union has monitored its traffic sensitive system in the past and particularly as it related to traffic congestion and exhaust. Nevertheless, Union did not have the specific system in place that would address the specific requirements required by Qwest until recently.
- 4. As to Union's new software which tracks system usage, in September 2006 Union lost a business account over its grade of service concern. Given this, Union determined that it would install a new system that would better track system outages and capacity usage. A contract for off-the-shelf software was signed with a vendor in October 2006. Union reconfigured an existing server, by increasing memory and disk space, which allowed the

system to be installed quickly. The new software tracking system was installed and configured during November and December, and began processing data from Union's wireless network in early January of this year. We have been utilizing these statistics since early March to traffic administer our wireless network. These results were reflected in my filed testimony to the Commission.

5. Again, while counsel may not have been aware of the system installation until my earlier conversation, the system has been in the process of expedited development and has been implemented to accomplish the very concerns raised by our customers.

Contrary to Qwest's assertion in its Opposition, knowledge of the system software was not withheld from Qwest, but was made known to it as counsel was aware. The system is now incorporated into our day-to-day traffic administration of the network, and will be a useful tool in the future for Union and for the Commission.

FURTHER, the Affiant sayeth not.

DATED this day of April, 2007.

Henry D. Jacobsen

STATE OF WYOMING) ss.

COUNTY OF

Subscribed, sworn to and acknowledged before me, a Notary Public, by Henry D. Jacobsen this _920 day of April, 2007.

My Commission Expires: 5/28/2010

Elizabeth L. Tanner Notary Public State of Wyoming County of Uinta ommission Expires May 28, 2010

Notary Public